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3 IN THE MATTER OF )  
4 COUNTY ROAD 10 LANDFILL ) VOLUME II  
5 (HIMCO DUMP) )  
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12 The continued sworn statement of JERRY D.  
13 PERRIN, called as a witness by Miles Inc., taken  
14 before Rosemary J. Bell, CSR, RPR, a Notary  
15 Public in and for the County of St. Joseph and  
16 State of Indiana, at Barnes & Thornburg, 305  
17 Ameritrust National Bank Building, 301 South  
18 Main Street, Elkhart, Indiana, on Wednesday,  
19 September 16, 1992, commencing at the hour of  
20 8:48 a.m.  
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**APPEARANCES:**

**MR. REED S. OSLAN**  
**Kirkland & Ellis**  
**200 East Randolph Drive**  
**Chicago, Illinois 60601**

**Appeared on behalf of Miles Inc.**

1 JERRY D. PERRIN,  
2 called as a witness, having been previously duly  
3 sworn, was examined and testified further as  
4 follows:

5 EXAMINATION (Continued)

6 BY MR. OSLAN:

7 Q. Good morning. We are just beginning to move  
8 into the L category of customers of HIMCO that  
9 disposed of their waste at the County Road 10  
10 Landfill. So why don't we just continue on with  
11 that.

12 The next customer I have on my list is  
13 Leo's Applicators at 10920 McKinley West in  
14 Osceola. At least that's the address I have.

15 Are you familiar with that company?

16 A. Yes, sir.

17 Q. What is their business?

18 A. Well, they're remodelers, but I don't really  
19 recall their trash, and I personally don't  
20 believe they were there in the years of the  
21 landfill at County Road 10.

22 Q. So you believe that Leo's Applicators did not  
23 send their waste to the landfill?

24 A. That's correct.

25 Q. The next customer I have is Liberty Homes, 1105

1           Eisenhower, Goshen.

2                   Are you familiar with that company?

3   A.    Yes, sir.

4   Q.    What is their business?

5   A.    They were a mobile home manufacturer.

6   Q.    Did Liberty Homes dispose of its waste at the  
7           County Road 10 Landfill?

8   A.    I believe so.

9   Q.    Are you familiar with the types of waste they  
10          disposed of there?

11   A.    Yes.

12   Q.    Would that include scrap steel or scrap metals?

13   A.    Yes.

14   Q.    Did it include glues, cans with glues in it?

15   A.    Yes.

16   Q.    Paints?

17   A.    Yes.

18   Q.    Paint wastes?

19   A.    Yes.

20   Q.    Did Liberty Homes dispose of primers at the  
21          landfill?

22   A.    I would say more than likely, yes.

23   Q.    Okay. How about lacquers?

24   A.    Yes.

25   Q.    Paint thinners?

- 1 A. Yes.
- 2 Q. Solvents?
- 3 A. Yes.
- 4 Q. Soldering agents and fluxes?
- 5 A. Very strong possibility, yes.
- 6 Q. Do you believe that Liberty Homes did dispose of
- 7 soldering agents and fluxes at the landfill?
- 8 A. Yes.
- 9 Q. How about oils and greases?
- 10 A. No.
- 11 Q. Okay. Do you recall any other types of waste
- 12 that Liberty Homes disposed of at the landfill?
- 13 A. Yes. It runs in my mind that they might have
- 14 had some glue barrels.
- 15 Q. Did they dispose of roof coat?
- 16 A. Yes, I believe.
- 17 Q. How about caulking?
- 18 A. Yes.
- 19 Q. Did they also dispose of the general types of
- 20 waste that we've been talking about so much, the
- 21 banding and cardboard and skids and so on?
- 22 A. Yes, sir.
- 23 Q. Can you recall any other types of waste that
- 24 Liberty Homes disposed of at the landfill?
- 25 A. No, sir.

- 1 Q. What size container did Liberty Homes have?
- 2 A. They had a 48-yard.
- 3 Q. How frequently was that emptied?
- 4 A. I believe a couple times a week.
- 5 Q. Are you aware of any other companies that were
- 6 picking up their waste during this time period?
- 7 A. No, sir.
- 8 Q. The next customer I have is Lichti Foreign Car
- 9 Service, 710 Logan Street.
- 10 Are you familiar with that company?
- 11 A. No, sir.
- 12 Q. The next company I have is Linden Mobile Home
- 13 Park, 19350 South Line Road.
- 14 Are you familiar with that company?
- 15 A. Yes, sir.
- 16 Q. What business are they in?
- 17 A. It's just a mobile home park. And I would call
- 18 it normal household refuse.
- 19 Q. Okay. So to your recollection, Linden Mobile
- 20 Home Park did not dispose of any industrial-type
- 21 waste at the landfill?
- 22 A. No, sir.
- 23 Q. The next customer is Linville Olds-Cadillac,
- 24 1201 North Nappanee Street.
- 25 A. Yes, sir.

- 1 Q. Is that a full-service dealership?
- 2 A. Yes, sir.
- 3 Q. Do they do automobile maintenance and repair at
- 4 that dealership?
- 5 A. Yes, sir.
- 6 Q. Did Linville Olds-Cadillac dispose of its waste
- 7 at the County Road 10 Landfill?
- 8 A. I do not believe so, sir.
- 9 Q. Okay. The next customer I have is Lithotone,
- 10 Inc., 1313 West Hively Avenue.
- 11 Do you know that company?
- 12 A. Yes, sir.
- 13 Q. What is their business?
- 14 A. They were into the printing business.
- 15 Q. Okay. Did Lithotone dispose of its waste at the
- 16 County Road 10 Landfill?
- 17 A. Yes, sir.
- 18 Q. Are you familiar with the types of waste they
- 19 disposed of there?
- 20 A. No, sir.
- 21 Q. You don't recall anything about their waste?
- 22 A. The only thing that runs in my mind, Lithotone
- 23 had some big rolls of paper that they would
- 24 throw away, but other than that --
- 25 Q. Okay. The next customer I have is Lone Star

1 Industries, 55284 Corwin Street.

2 Do you know that company?

3 A. The name sounds familiar, but I can't recall  
4 anything about them.

5 Q. The next company I have is Lori Corporation, 500  
6 Central Avenue, Northfield, Illinois.

7 Do you know that company?

8 A. No, sir.

9 Q. The next company I have is Lochmandy Rambler  
10 Sales, Inc., 1230 West Bristol.

11 Are you familiar with that company?

12 A. Yes, sir.

13 Q. What business are they in?

14 A. They were a car dealership.

15 Q. Did Lochmandy do automobile maintenance and  
16 repair at its facility?

17 A. Yes, sir.

18 Q. Did Lochmandy dispose of its waste at the County  
19 Road 10 Landfill?

20 A. Yes, sir.

21 Q. Are you familiar with the types of waste they  
22 sent there?

23 A. Yes, sir.

24 Q. Did they send oily rags?

25 A. Yes, sir.

- 1 Q. Automobile fluids, brake fluids and engine  
2 fluids?
- 3 A. Yes, sir.
- 4 Q. Used batteries?
- 5 A. Yes, sir.
- 6 Q. Used tires?
- 7 A. Yes, sir.
- 8 Q. Solvents?
- 9 A. Yes, sir.
- 10 Q. Degreasers?
- 11 A. Yes, sir.
- 12 Q. Do you recall anything else about Lochmandy's  
13 waste that they sent to the landfill?
- 14 A. They probably threw away some old bumpers and  
15 mufflers and tailpipes and so on.
- 16 Q. Did they dispose of oily engine parts?
- 17 A. Yes, sir.
- 18 Q. What size container did Lochmandy have?
- 19 A. I think they had a 16-yard.
- 20 Q. How often was that emptied?
- 21 A. I believe they were on a call-in basis. So I  
22 would say probably an average of once every two  
23 weeks.
- 24 Q. Are you aware of any companies that were picking  
25 up their trash during that period?

1 A. No, sir.

2 Q. The next customer I have is MDK Corp., 415 New  
3 Street.

4 Do you know that company?

5 A. By name only, sir.

6 Q. You don't recall anything specific about their  
7 waste?

8 A. No, sir.

9 Q. The next customer I have is Manufacturers  
10 Wholesale, Inc.

11 A. Yes.

12 Q. Do you know that company?

13 A. They were a mobile home parts distributor.

14 Q. Did they dispose of their waste at the landfill?

15 A. Yes, sir.

16 Q. What types of waste did they send there?

17 A. Just mostly banding, wood, cardboard, the office  
18 paper.

19 Q. Were there any particular parts that they  
20 disposed of at the landfill that you recall?

21 A. Not to my knowledge, sir.

22 Q. What size container did they have?

23 A. I believe they had a 16-yard.

24 Q. How often was that emptied?

25 A. Maybe once a week.

1 Q. The next customer I have is Manville Sales  
2 Corporation, 2730 Industrial Parkway.  
3 A. Yes, sir.  
4 Q. What company was that?  
5 A. They had insulation and putties, I believe.  
6 Q. Were they manufacturers of those items?  
7 A. I don't think so.  
8 Q. Just wholesalers or --  
9 A. Yes.  
10 Q. -- suppliers?  
11 A. Yes, sir.  
12 Q. Did they dispose of their waste at the landfill?  
13 A. Yes, sir.  
14 Q. Did they dispose of insulations and putty waste  
15 at the landfill?  
16 A. Yes, sir.  
17 Q. Do you recall any other types of waste that they  
18 disposed of at the landfill?  
19 A. No. Just your typical cardboard and paper and  
20 some skids.  
21 Q. What types of putties; do you recall? Some  
22 adhesive-type substance?  
23 A. I think it was. And I think they might have had  
24 a little of the muddy putty too.  
25 Q. And would they dispose of that in pails or

1           buckets?

2   A.    It runs in my mind if they were damaged, they

3           may have, yes, sir.

4   Q.    Okay.  What size container did they have?

5   A.    I believe they had a 16-yard.

6   Q.    How often was that emptied?

7   A.    I would say probably on the average of once a

8           week.

9   Q.    The next company I have is Marengo Disposal,

10          6201 Maple, Marengo, Illinois.

11                   Do you know that company?

12   A.    No, sir.

13   Q.    The next customer I have is Maurer Industrial

14          Supply, 29066 Lexington Park Drive.

15                   Are you familiar with that company?

16   A.    No, sir.

17   Q.    The next company I have is McHenry/Woodstock

18          Disposal, McHenry, Illinois.

19                   Do you know that company?

20   A.    No, sir.

21   Q.    Okay.  The next customer I have is McHenry Olds-

22          Cadillac, 1201 North Nappanee Street.

23                   Are you familiar with that dealership?

24   A.    Yes, sir.

25   Q.    Was that a full-service and maintenance

- 1 dealership?
- 2 A. Yes, sir.
- 3 Q. Did McHenry Olds Cadillac dispose of its waste  
4 at the landfill?
- 5 A. Yes, sir.
- 6 Q. Are you familiar with the types of waste they  
7 disposed of there?
- 8 A. Yes, sir.
- 9 Q. Did they dispose of oily rags and wastes with  
10 oil on them?
- 11 A. Yes, sir.
- 12 Q. Did they dispose of automobile fluids, brake  
13 fluids, engine fluids?
- 14 A. Yes, sir.
- 15 Q. Did they dispose of used batteries at the  
16 landfill?
- 17 A. Yes, sir.
- 18 Q. Did they dispose of used tires at the landfill?
- 19 A. Yes, sir.
- 20 Q. Did they dispose of solvents at the landfill?
- 21 A. Yes, sir.
- 22 Q. Did they dispose of degreasers at the landfill?
- 23 A. Yes, sir.
- 24 Q. Did they dispose of old automobile engine parts  
25 with oil on them?

1 A. Yes, sir.

2 Q. Do you recall any other types of waste that  
3 McHenry Olds-Cadillac disposed of at the  
4 landfill?

5 A. No, sir.

6 Q. What size container did they have?

7 A. I believe they had a 16-yard.

8 Q. And again how often was that emptied?

9 A. I believe they were on a call-in basis. I'd say  
10 once every two weeks.

11 Q. Okay. Are you aware of any other companies that  
12 were picking up their waste during that time?

13 A. No, sir.

14 Q. Are they still in business?

15 A. McHenry, no, sir.

16 Q. The next customer I have is Metlock, Inc., 29154  
17 Phillips Street.

18 Are you familiar with that company?

19 A. No, sir.

20 Q. The next company I have is Michiana Beechcraft,  
21 Inc., south side airport.

22 Do you know that company?

23 A. Yes, sir.

24 Q. What were they in the business of?

25 A. I didn't know that they were in the business of

1           anything. They were just up at the airport at  
2           some of the hangars.

3 Q. Did they dispose of their waste at the landfill?

4 A. Yes, sir.

5 Q. What types of waste did they dispose of?

6 A. I'm not real sure, sir.

7 Q. Okay. The next company I have is Mid-City  
8       Supply Company, 940 Industrial Parkway.

9 A. Yes, sir.

10 Q. Are you familiar with that company?

11 A. Yes, sir.

12 Q. What business are they in?

13 A. They're a plumbing supply house.

14 Q. Did they dispose of their waste at the County  
15       Road 10 Landfill?

16 A. I don't think so, sir. I think they came after  
17       the County Road 10 Landfill.

18 Q. Okay. The next company I have is Midwest  
19       Commerce Data.

20                       Do you know that company?

21 A. By name.

22 Q. You don't recall anything about what waste they  
23       had?

24 A. No. It would have been paper because they were  
25       in data processing.

1 Q. The next customer I have is Midwestern Rubber  
2 Products, 2124 West Wilden in Goshen possibly.

3 Do you know that company?

4 A. Yes, sir.

5 Q. What business are they in?

6 A. They manufactured rubber products. And the only  
7 thing I can really remember about them is they  
8 had what's known as rubber black.

9 Q. That's the substance we talked about earlier --

10 A. Yes, sir.

11 Q. -- that makes everything black?

12 A. Yes, sir.

13 Q. Okay. Did they dispose of oily rags and greasy  
14 rags?

15 A. Not -- not that I can recall, sir.

16 Q. Do you recall any other types of waste that  
17 Midwestern Rubber disposed of at the landfill?

18 A. Nothing other than maybe some discarded rubber  
19 products like at the end of things. And I think  
20 they also had -- made some rubber stampings for  
21 sealing valves for water lines or whatever when  
22 you put a valve in there.

23 Q. Okay. Do you know if they disposed of any  
24 wastes that were sealers?

25 A. No, sir, I don't.

- 1 Q. Okay. What size container did they have?
- 2 A. I think they had a 16-yard.
- 3 Q. And how often was that emptied?
- 4 A. I would say on average about once a week.
- 5 Q. I take it you're familiar with Miles Inc.?
- 6 A. Yes, sir.
- 7 Q. That's the next customer on the list. Did Miles
- 8 Inc. dispose of waste at the County Road 10
- 9 Landfill?
- 10 A. Yes, sir.
- 11 Q. What types of waste did Miles dispose of at the
- 12 landfill?
- 13 A. Mycelium, enzymes, caustic soda, cardboard,
- 14 paper, skids, drums, 5-gallon pails. Medical --
- 15 like CLINISTIX, Alka-Seltzers, vitamin tablets,
- 16 Bactine, Bactine in cream, Bactine in spray
- 17 cans, Bactine in plastic bottles. Plastics,
- 18 pipes with -- stainless steel pipes, valves,
- 19 regular cast iron pipes. Some of these pipes
- 20 had insulation around them, probably with the
- 21 asbestos wrapped coating on them for steam
- 22 pipes. Bricks, asphalt, blocks. Lots of fiber
- 23 drums. I believe that's a pretty good
- 24 description of Miles.
- 25 Q. Okay. Can you recall any other types of waste

1           they disposed of at the landfill?

2                   Did you mention calcium sulfate?

3 A.    No, I didn't. Calcium sulfate by the tons.

4 Q.    Was the largest percentage of the waste that  
5       Miles sent to the site calcium sulfate?

6 A.    Yes, sir.

7 Q.    And then was mycelium also a large percentage of  
8       Miles' waste?

9 A.    It runs in my mind that -- what did they call  
10       it? Back in those days mycelium wasn't the big  
11       part. Because of the new way they make it now,  
12       there's more mycelium nowadays than there was  
13       back then. And they had some stuff that they  
14       called filter cake back then that they would run  
15       out. And they would -- and I believe the filter  
16       cake was where they -- in one of the processes  
17       when they either made citric acid or whatever,  
18       every so often they'd have to clean this out,  
19       and it was a brown, and they would tell us that  
20       we're going to clean out and we're going to have  
21       some filter cake. But to say exactly what was  
22       in it, I can't do that.

23 Q.    How many containers did Miles have?

24 A.    I believe there was seven on the turntable,  
25       there was Door 6 north and south, there was

1        Building 17, there was maintenance, there was  
2        Building 5, there was the warehouse, and I  
3        believe at that time they had one over in the  
4        dock area, shipping and receiving.

5    Q.    On the turntable you mentioned there were seven  
6        containers. How large were those?

7    A.    Those were 16-yard.

8    Q.    And how frequently would a 16-yard container on  
9        the turntable be emptied?

10   A.    We used to kind of determine about every 45  
11        minutes to an hour at least one container was  
12        filled.

13   Q.    And how often would you pick up one of those  
14        containers and take it to the landfill?

15   A.    Well, when you went to the turntable, you  
16        cleaned the turntable. So if there were seven  
17        full ones on there, you probably hauled eight or  
18        nine before you emptied the turntable. Because  
19        by the time you hauled the seven that were full,  
20        they were filling up one or two while you were  
21        in the process of trucking back and forth.

22   Q.    And the waste in those containers, was that  
23        calcium sulfate?

24   A.    Yes, sir.

25   Q.    So the seven containers on the turntable always

1           had calcium sulfate in them --

2   A.    Yes.

3   Q.    -- when you would take them to the landfill?

4   A.    (Witness nods head.)

5   Q.    Okay. At Door 6 you said there was a north and

6           south. How frequently would you dispose of or

7           empty those containers, and how large were those

8           containers?

9   A.    I believe they were 22-yard containers. And

10          they would probably be dumped as high as three

11          or four times a day. Maybe not the Door 6

12          north. At least twice a day, I think, on the

13          north. That was the crusher.

14   Q.    Door 17 had what size container?

15   A.    Building 17 I think was a 16-yard container.

16   Q.    How frequently was that emptied?

17   A.    Probably on the average of once a day at least.

18   Q.    Okay. You said maintenance had a container.

19          How large was that?

20   A.    I think maintenance had an 8-yard. It might

21          have went to a 16-yard later, though.

22   Q.    How often was that emptied?

23   A.    That was probably emptied on a daily basis also.

24   Q.    I think you said Building 5 had a container?

25   A.    Yes.

- 1 Q. How large was that?
- 2 A. I believe that was a 16-yard also.
- 3 Q. How often was that emptied?
- 4 A. That was probably at least once a day, maybe  
5 twice a day.
- 6 Q. And the last container you mentioned was at the  
7 warehouse. How large was that one?
- 8 A. I believe that was a 16-yard too.
- 9 Q. And how --
- 10 A. That was probably once a day at least.
- 11 Q. If you exclude the calcium sulfate -- which is  
12 by far the largest volume of waste that Miles  
13 sent there; right?
- 14 A. (Witness nods head.)
- 15 Q. If you exclude that, are you able to estimate  
16 the total volume of waste from Miles in relation  
17 to everybody else who sent stuff there during  
18 the eight-year period that you worked at the  
19 landfill?
- 20 A. Well, this will just be my best guess. I would  
21 say when I started at the landfill, it probably  
22 produced a third, and probably by the time we  
23 left the landfill, maybe down to a fourth.
- 24 Q. Okay. So excluding the calcium sulfate, Miles  
25 shipped, at least at the beginning, about a

1           third of the waste into the landfill, and then  
2           towards the end, Miles shipped about 25 percent  
3           of the waste into the landfill? Is that your  
4           best recollection?

5   A.    Yes. I think their -- I think what they shipped  
6           was as much, if not more, than when I started.  
7           The only thing I'm basing this on is we had  
8           picked up more customers over the years that I  
9           was there, so I think the rate would have  
10          shifted a little bit.

11   Q.    The next customer I have is Miller Steel Supply,  
12          29414 Phillips Street.

13                   Are you familiar with that company?

14   A.    No, sir. I shouldn't say no. I am -- I know  
15          the company, but I don't recall getting much out  
16          of there. I don't -- I know where it was.

17   Q.    Okay. The next customer is Miller Structures.

18   A.    No, sir.

19   Q.    You don't recall them?

20   A.    (Witness shakes head.)

21   Q.    The next customer I have is Minit Print, 127  
22          West Marion.

23                   Do you know that company?

24   A.    Yes, sir.

25   Q.    What business are they in?

- 1 A. They're just a little minute print company that  
2 if you go down there, they'll copy for you or  
3 print for you or whatever.
- 4 Q. Did they dispose of their waste at the County  
5 Road 10 Landfill?
- 6 A. I do not believe so. I believe they came after  
7 County Road 10 Landfill.
- 8 Q. Okay. The next customer I have is Mishawaka  
9 Trailer Supply, 1251 North Nappanee.
- 10 Do you know that company?
- 11 A. Yes, sir.
- 12 Q. What was their business?
- 13 A. They were a trailer supply outfit. Had about  
14 anything you'd need for the mobile home  
15 industry.
- 16 Q. Did they dispose of their waste at the County  
17 Road 10 Landfill?
- 18 A. Yes, sir.
- 19 Q. What types of waste did they send there?
- 20 A. Mostly skids, cardboard, paper.
- 21 Q. Did they dispose of any old or used trailer  
22 products at the landfill, old refrigerators or  
23 anything like that?
- 24 A. Not that I can recall, no, sir.
- 25 Q. Okay. Do you recall any other types of waste

1           that Mishawaka Trailer disposed of at the  
2           landfill?

3   A.    No, sir.

4   Q.    The next customer I have is Mittler Supply, 1820  
5           Mishawaka Street.

6                   Do you know that company?

7   A.    Yes, sir.

8   Q.    What is their business?

9   A.    Well, they're a welding supply, and they supply  
10          oxygen and acetylene for cutting torches and  
11          whatever. You can get your bottles filled  
12          there.

13   Q.    Did they dispose of their waste at the County  
14          Road 10 Landfill?

15   A.    Yes, sir.

16   Q.    What types of waste did they dispose of there?

17   A.    They had some skids. The biggest thing I can  
18          remember about Mittler was that they would throw  
19          away welding wire for a wire-feed welder. And I  
20          had to beg them to let us know when that was  
21          coming because if you run over it with the  
22          bulldozer, you'd get it caught in the tracks,  
23          and it was just a terrible mess.

24   Q.    Okay. Did they --

25   A.    Other than that, just the normal cardboard and

1 paper it took to run their office.

2 Q. How about soldering agents?

3 A. Not to my knowledge. They would have sold the  
4 soldering agents to other manufacturers.

5 Q. Did they dispose of any tanks, acetylene tanks  
6 or anything like that?

7 A. No, sir.

8 Q. How large was their container?

9 A. I believe it was a front-end loader. Probably a  
10 4-yard.

11 Q. How often was that emptied?

12 A. Probably on a maybe once every two weeks basis.

13 Q. The next customer I have is Mobilcraft Wood  
14 Products, P.O. Box 1103.

15 Do you know that company?

16 A. The name sounds familiar, but I can't recall  
17 anything about them, sir.

18 Q. Okay. The next company I have is Modular  
19 Plastics, 28672 Holiday Place.

20 Do you know that company?

21 A. There again, the name sounds familiar, but I  
22 don't remember anything about them.

23 Q. The next customer I have is Monarch Industries,  
24 Inc., P. O. Box 1, Goshen.

25 Do you know that company?

1 A. No, sir. There again, the name sounds familiar,  
2 but I can't recall their --

3 Q. Okay. The next customer I have is Monogram  
4 Industries, 2514 Nagy Drive.

5 Do you recall them?

6 A. The name again is familiar, but I don't recall  
7 anything about them.

8 Q. Okay. Well, that's okay. We're going back a  
9 long time.

10 The next customer I have is Mor-Ryde,  
11 Inc., 1966 Moyer Avenue.

12 A. Yes, sir.

13 Q. Do you know them?

14 A. Yes, sir.

15 Q. What business were they in?

16 A. They made what they called a Mor-Ryde suspension  
17 system for the mobile homes.

18 Q. Did Mor-Ryde dispose of its waste at County Road  
19 10?

20 A. Yes, sir.

21 Q. Are you familiar with the types of waste they  
22 sent there?

23 A. Yes, sir.

24 Q. What types did they send there?

25 A. Quite a bit of steel bandings, quite a bit of

- 1 skids or heavy wood materials. And I also  
2 believe that they threw away some paint cans,  
3 possibly some thinners.
- 4 Q. Did they dispose of solvents or degreasers at  
5 the landfill?
- 6 A. Yes, sir.
- 7 Q. Did they dispose of soldering agents and fluxes?
- 8 A. It's a possibility, but I'm not sure, sir.
- 9 Q. Okay. How about glues or epoxies?
- 10 A. No, I don't think so, sir.
- 11 Q. Okay. Scrap metal?
- 12 A. I think there could have been a few pieces of  
13 scrap metal thrown away, yes, sir.
- 14 Q. Okay. Do you recall anything else about  
15 Mor-Ryde's waste?
- 16 A. No, sir.
- 17 Q. What size container did they have?
- 18 A. I believe they had a 16-yard.
- 19 Q. How often was that emptied?
- 20 A. Probably about a once a week deal.
- 21 Q. The next customer I have is Morgan Drive Away,  
22 Inc..
- 23 Are you familiar with that company?
- 24 A. Yes, sir.
- 25 Q. What do they do?

- 1 A. They just deliver mobile homes and vans.
- 2 Q. Okay. Did they dispose of their waste at County  
3 Road 10?
- 4 A. Yes, sir.
- 5 Q. What types of waste did they send there?
- 6 A. The only thing that I can recall, I think they  
7 had just the normal office paper. I believe  
8 they had a small container, front-end loader.
- 9 Q. Did they deliver these mobile homes and vans on  
10 their own trucks?
- 11 A. Yes.
- 12 Q. Do they do truck maintenance at their facility?
- 13 A. I do not know, sir.
- 14 Q. The next customer is Motor Supply Company.  
15 Do you know that company?
- 16 A. Yes, sir.
- 17 Q. What do they do?
- 18 A. Well, they sell parts to the automobile  
19 industry. Then they had a little machine shop  
20 down there where they would -- if you were  
21 overhauling your engine, they could boil it out  
22 in a boil tank and get it ready for new rings,  
23 rods, and grinding crankshafts and valve guides  
24 for heads and --
- 25 Q. Okay. Did Motor Supply dispose of its waste at

1 the landfill?

2 A. Yes, sir.

3 Q. What types of waste did they send there?

4 A. The thing that I can remember about Motor Supply  
5 was once in a while they would call up and we  
6 would go down there, and you could maybe just  
7 take a pickup truck. And they would clean this  
8 sludge out from cooking these engines or heads,  
9 and they would have these sludge barrels, and  
10 we'd go down there and pick up about six at a  
11 time, four to six at a time on skids.

12 Q. Was this a greasy or oily sludge?

13 A. Yes, sir.

14 Q. Okay. Did they also dispose of oily rags and  
15 oil wastes?

16 A. A strong possibility, but I cannot recall. The  
17 main thing I recall about them was just getting  
18 the sludge barrels.

19 Q. Do you recall whether they disposed of any  
20 degreasers?

21 A. I would say in the sludge barrels were probably  
22 degreaser agents, yes, sir.

23 Q. How large a container did they have?

24 A. I believe that was a front-end loader stop as  
25 far as their trash other than the barrels.

1 Q. Okay. And how often was that emptied?

2 A. It was strictly done on a call-in basis. I

3 would say maybe three or four times a year

4 picking up the barrels.

5 Q. Are they still in business?

6 A. I believe so, yes.

7 Q. The next customer I have is Nagy and Associates,

8 E.J. Nagy and Associates.

9 Do you know that company?

10 A. The name is familiar, but there again, their

11 trash I cannot --

12 Q. Okay. The next customer I have is Nationwide

13 Draperies Inc., 811 South Main Street.

14 A. No, sir.

15 Q. You don't recall them?

16 A. (Witness shakes head.)

17 Q. Okay. The next company I have is Needlecraft,

18 Inc., 2727 Industrial Parkway.

19 Are you familiar with that company?

20 A. No, sir.

21 Q. The next customer I have is Nickell Enterprises,

22 200 Windsor.

23 A. Uh-huh.

24 Q. Do you know that company?

25 A. No, sir.

- 1 Q. Okay. The next customer I have is Northern Box  
2 Co. Inc., 1328 Mishawaka Street.
- 3 A. Yes, sir.
- 4 Q. Do you know them?
- 5 A. Yes, sir.
- 6 Q. What was their business?
- 7 A. They -- they were -- they would make up boxes of  
8 any size you wanted and shape. And what I  
9 recall about them is they had a lot of  
10 cardboard. They had a lot of skids. They had  
11 some banding.
- 12 Q. Did they use glues or epoxies and dispose of  
13 those wastes?
- 14 A. Yes, sir, I believe they did.
- 15 Q. Did they dispose of empty buckets with glue  
16 residues and epoxy residues in them?
- 17 A. Yes, sir.
- 18 Q. How about paint, any paints, paint wastes?
- 19 A. Not that I can recall, sir.
- 20 Q. Can you recall any other types of waste that  
21 Nickell Enterprises disposed of at the landfill?
- 22 A. No, sir.
- 23 Q. What size container did they have?
- 24 A. I believe they had a 16-yard.
- 25 Q. I'm sorry, I think I just misspoke. We were

1 talking about Northern Box Company; correct?

2 A. Right.

3 Q. So the wastes that you just referred to are  
4 wastes that Northern Box Company sent to the  
5 landfill?

6 A. Yes, sir.

7 Q. What size container did they have?

8 A. I believe it was 16 yards, sir.

9 Q. And how often was that emptied?

10 A. I think they were on a call-in basis, so I think  
11 that would be about once a week.

12 Q. The next customer I have is Norwood Products,  
13 County Road 22.

14 Do you know them?

15 A. No, sir. I shouldn't say no. The name sounds  
16 familiar, but I don't recall the trash.

17 Q. The next company I have is NIPSCO.

18 Are you familiar with that company?

19 A. Yes.

20 Q. That's the public utility; right?

21 A. Right.

22 Q. Did NIPSCO dispose of waste at the County Road  
23 10 Landfill?

24 A. Yes, I believe they did.

25 Q. Do you recall what types of waste they sent

1           there?

2   A.    No, sir. I believe it was just a front-end  
3           loader of the office part.

4   Q.    Okay. The next customer I have is Oak Lawn  
5           Center, 2600 Oakland Street.

6                   Do you know that customer?

7   A.    Yes, sir.

8   Q.    What do they do?

9   A.    Well, it's a -- I don't know how to describe  
10           it. The Oak Lawn Center, you can go out there  
11           for treatment if you're having a nervous  
12           breakdown. I believe they also have an old  
13           folks home there.

14                   To recall their trash, I don't. I  
15           know where the Oak Lawn Center is and I know we  
16           pick up their trash, but I'm not even sure if  
17           the Oak Lawn Center was there at this time  
18           period of County Road 10.

19   Q.    Okay. The next customer I have is PCF Foam  
20           Corp.

21                   Are you familiar with that company?

22   A.    Yes, sir. The name sounds familiar. But I --  
23           with a P. O. Box 1223, I can't recall their  
24           trash.

25   Q.    Okay. The next customer I have is Palmer

1 Hardware Store, 111 Prairie Court.

2 Do you know them?

3 A. Yes, sir. I know where Palmer Hardware Store  
4 is, but I cannot recall their trash.

5 Q. Okay. The next company I have is Panyl Corp. --  
6 that's P-a-n-y-l -- 1920 West Lusher.

7 Are you familiar with that company?

8 A. Yes, sir.

9 Q. What business are they in?

10 A. I'm not sure. I -- the name is familiar. I  
11 know where the company is, but to recall their  
12 trash, I -- no, sir.

13 MR. OSLAN: Okay. Why don't we take a  
14 short break.

15 (Whereupon a short recess was  
16 taken.)

17 BY MR. OSLAN:

18 Q. The next customer I have is Parr, Inc., County  
19 Road 6 and 13.

20 Do you know that company?

21 A. Yes.

22 Q. What is their business?

23 A. They make putty.

24 Q. Okay. Did Parr dispose of its waste at County  
25 Road 10?

- 1 A. Yes.
- 2 Q. Are you familiar with the types of waste they  
3 disposed of there?
- 4 A. Yes.
- 5 Q. What types of waste did they dispose of at the  
6 landfill?
- 7 A. Well, a lot of skids and a lot of putty -- how  
8 do I describe it? It's gray in color. It's  
9 soft. It could be three-quarters of an inch  
10 wide to an inch and a half wide, and if you were  
11 putting a mobile home window in, you might take  
12 this putty and string it around there and then  
13 put your window in there and put the screws in  
14 and take a knife and cut.
- 15 Q. So it's kind of a weatherstripping?
- 16 A. Right.
- 17 Q. Did they also dispose of industrial waste such  
18 as oily rags and that type of waste?
- 19 A. Yes, sir.
- 20 Q. How about grease or degreasers?
- 21 A. I'm not sure, sir.
- 22 Q. Okay. How about adhesives or glues?
- 23 A. I would say yes, there were empty buckets from  
24 -- they had to bind this stuff together somehow.
- 25 Q. Right. So buckets with residues of various

1           adhesives?

2   A.    Yes, sir.

3   Q.    How about solvents?

4   A.    Yes, sir.

5   Q.    Do you recall any other types of waste that

6           Parr, Inc., disposed of at the landfill?

7   A.    No, sir.

8   Q.    How large a container did they have?

9   A.    I believe they had a roll-off container,

10           probably a 40-yard.

11   Q.    How often was that emptied?

12   A.    I'd say on a once a week basis.

13   Q.    Was anybody else disposing of their waste at

14           that time?

15   A.    Not to my knowledge, sir.

16   Q.    The next customer I have is Particle Board

17           Plywood Distributors Corp., 1806 Conant Drive.

18                   Do you know them?

19   A.    No, sir. The name is familiar there again, but

20           I cannot recall them.

21   Q.    Okay. The next customer I have is Peachtree

22           Doors Inc., Strato Fold Division, 1919

23           Cassopolis Street.

24                   Do you know them?

25   A.    Yes, sir.

- 1 Q. What business were they in?
- 2 A. They were a manufacturer of doors for the mobile  
3 home industry.
- 4 Q. Wood doors, aluminum doors?
- 5 A. I believe they made wood -- aluminum doors and  
6 the folding doors like in between a closet that  
7 would slide back and forth kind of out of vinyl.
- 8 Q. Okay. Did Peachtree Doors dispose of its waste  
9 at the County Road 10 Landfill?
- 10 A. Yes, sir.
- 11 Q. What types of waste did they send there?
- 12 A. I would say probably some aluminum for doors  
13 that was possibly damaged. And it runs in my  
14 mind a lot of corrugated -- these doors had a  
15 corrugated -- beehive type of corrugated  
16 cardboard in between the panels.
- 17 Q. Okay. How about adhesives or glues?
- 18 A. Yes, sir.
- 19 Q. Did they dispose of any solvents?
- 20 A. Not to my knowledge, sir.
- 21 Q. Okay. Did they dispose of metal parts or metal  
22 particles?
- 23 A. Yes.
- 24 Q. Okay. Did they dispose of door components like  
25 hinges or screws, bolts?

1 A. Yes.

2 Q. That type of thing?

3 A. Yeah.

4 Q. Do you recall -- how about paint, paint waste?

5 A. Yes, sir.

6 Q. Do you recall any other types of waste that

7 Peachtree Doors disposed of at the landfill?

8 A. No, sir.

9 Q. What size container did they have?

10 A. I believe they had a 16-yard.

11 Q. And how often was that emptied?

12 A. I would say probably once a week range.

13 Q. Was anybody else picking up their waste during

14 that time period?

15 A. Not to my knowledge, sir.

16 Q. The next customer I have is Phillips 66 Service,

17 4412 South Main Street.

18 Do you know them?

19 A. No, sir.

20 Q. The next customer I have is Pierre Moran W/C,

21 Pierre Moran Mall.

22 Do you know them?

23 A. Yes, sir.

24 Q. What type of waste did they send to the

25 landfill?

1 A. Just the normal everyday trash that would --  
2 probably a lot of cardboard, a lot of plastics.  
3 And it was a 16-yard stationary packer, I  
4 think.

5 Q. Okay. Do you recall how often that was emptied,  
6 their container?

7 A. I believe they were on a call-in basis, which I  
8 would say would average out once a week.

9 Q. The next customer I have is Plant 7 Machine &  
10 Tool Inc., 2737 Hammond Avenue.

11 Do you know them?

12 A. Yes, sir. I know where they're at.

13 Q. Do you recall whether they disposed of their  
14 waste at the landfill?

15 A. No, sir. I think they had a small container,  
16 and I can't recall --

17 Q. Okay. The next customer I have is Plastics  
18 Extrusion Operations, formerly Industrial  
19 Plastics, 57500 County Road 3.

20 Do you know them?

21 A. No, sir. The name again is familiar, but I --

22 Q. The next customer is Pete Fall Ford.

23 A. Yes, sir.

24 Q. Do you know them?

25 A. Yes, sir.

- 1 Q. Is that an automobile dealership?
- 2 A. Yes, sir.
- 3 Q. Do they do automobile maintenance and repair
- 4 there?
- 5 A. Yes, sir.
- 6 Q. Did Pete Fall Ford dispose of its waste at
- 7 County Road 10?
- 8 A. Yes, sir.
- 9 Q. Did they dispose of oil products, automobile
- 10 engine fluids at the landfill?
- 11 A. There again, I'd say yes, sir. But not -- I'm
- 12 taking this as the floor sweepings and their
- 13 oily rags.
- 14 Q. Not gallons and gallons of --
- 15 A. Right, sir.
- 16 Q. Did they dispose of used batteries?
- 17 A. Yes, sir.
- 18 Q. Used tires?
- 19 A. There again, I wouldn't accuse them of throwing
- 20 away batteries, but if a wreck come in and the
- 21 battery had been smashed, yes, sir.
- 22 Q. Okay. Used tires?
- 23 A. Yes, sir.
- 24 Q. How about solvents?
- 25 A. Yes, sir.

1 Q. Degreasers?

2 A. Yes, sir.

3 Q. Oily engine parts?

4 A. Yes, sir.

5 Q. Various parts of a car?

6 A. Yes, sir.

7 Q. Do you recall any other types of waste that Pete

8 Fall Ford disposed of at the landfill?

9 A. No.

10 Q. How large a container did they have?

11 A. I believe they had a 4-yard.

12 Q. How often was that emptied?

13 A. Probably on an average of once a week basis.

14 Q. The next customer I have is Pre-Finished Molding

15 and Door Inc., 211 Windsor Drive.

16 Do you know them?

17 A. Yes, sir.

18 Q. What business were they in?

19 A. They -- they prefinished moldings and doors.

20 Q. Okay. Did they dispose of their waste at County

21 Road 10?

22 A. Yes, sir.

23 Q. What types of waste did they dispose of there?

24 A. Well, wood, banding, and probably empty paint

25 cans, lacquer thinners, lacquer cans.

- 1 Q. Solvents?
- 2 A. Yes.
- 3 Q. Did they dispose of any machining oils?
- 4 A. Not to my knowledge.
- 5 Q. How about metal scraps or parts?
- 6 A. No, sir. It was wood.
- 7 Q. Okay. How about any sealers, sealer wastes,
- 8 cans with sealers in them?
- 9 A. Yes, sir.
- 10 Q. Do you recall anything else about Pre-Finished
- 11 Molding's wastes?
- 12 A. No, sir.
- 13 Q. What size container did they have?
- 14 A. I believe they had a 16-yard.
- 15 Q. How often was that emptied?
- 16 A. Probably on about a once a week basis.
- 17 Q. The next customer I have is Printing House,
- 18 Inc., 711 Middleton Run Road.
- 19 Do you know them?
- 20 A. No, sir.
- 21 Q. The next customer is Putnam Volkswagen, Inc.
- 22 A. Yes.
- 23 Q. 2200 Bypass Road.
- 24 Do you know them?
- 25 A. Yes, sir.

1 Q. Is that an automobile dealership that does  
2 automobile maintenance and service?  
3 A. Yes, sir.  
4 Q. Did Putnam Volkswagen dispose of its wastes at  
5 County Road 10?  
6 A. Yes, sir.  
7 Q. Did they dispose of oily rags?  
8 A. Yes, sir.  
9 Q. Did they dispose of engine fluids?  
10 A. Yes, sir.  
11 Q. Did they dispose of solvents?  
12 A. Yes, sir.  
13 Q. Degreasers?  
14 A. Yes, sir.  
15 Q. Oily engine parts?  
16 A. Yes, sir.  
17 Q. Automobile parts, various --  
18 A. Yes, sir.  
19 Q. Paint, paint wastes?  
20 A. I don't recall.  
21 Q. How about used batteries?  
22 A. Yes.  
23 Q. Do you recall anything else about Putnam  
24 Volkswagen's wastes going to the landfill?  
25 A. No, sir.

- 1 Q. How large a container did they have?
- 2 A. I believe they had a 4-yard container.
- 3 Q. How often was that emptied?
- 4 A. Probably on about a once a week deal.
- 5 Q. Was anybody else picking up their waste during
- 6 that time?
- 7 A. Not to my knowledge, sir.
- 8 Q. The next customer I have is Querry Tool-Die &
- 9 Engineering, 530 South Section.
- 10 Do you know them?
- 11 A. No, sir.
- 12 Q. The next customer I have is R.V. & M.H. Tire
- 13 Service, 22830 Pinecreek Road.
- 14 Do you know them?
- 15 A. No, sir.
- 16 Q. The next customer I have is Rapture Studios,
- 17 26449 Oakwood.
- 18 Do you know them?
- 19 A. No, sir.
- 20 Q. The next customer I have is Reese Products,
- 21 Inc., P. O. Box 1706.
- 22 Do you know them?
- 23 A. Yes, sir.
- 24 Q. What is their business?
- 25 A. They make hitches for pulling mobile homes.

- 1 Q. Did Reese Products dispose of their waste at  
2 County Road 10?
- 3 A. Yes, sir.
- 4 Q. What types of waste did they dispose of there?
- 5 A. A lot of skids, a lot of banding, a lot of  
6 cardboard. And I believe also some empty paint  
7 cans and probably thinner cans.
- 8 Q. Solvents?
- 9 A. Yes, sir.
- 10 Q. Did they use any sealers, dispose of sealer-type  
11 wastes?
- 12 A. Not to my knowledge, sir.
- 13 Q. How about degreasers?
- 14 A. Yes, sir.
- 15 Q. Okay. Do you recall any other types of waste  
16 that Reese Products disposed of at the landfill?
- 17 A. No, sir.
- 18 Q. What size container did they have?
- 19 A. I believe they had a 16-yard.
- 20 Q. How often was that emptied?
- 21 A. I would say maybe once a week.
- 22 Q. Was anybody else picking up their waste during  
23 that time?
- 24 A. Not to my knowledge, sir.
- 25 Q. The next customer I have is Regal Mold & Die

1 Inc., 231 South Six Span Bridge Road.

2 Do you know them?

3 A. No, sir.

4 Q. The next customer I have is Reproduction Labs,  
5 Inc., 28703 County Road 6.

6 Do you know them?

7 A. No, sir.

8 Q. The next customer I have is Riblet Products-  
9 Frame Division, P. O. Box 1645.

10 Do you know them?

11 A. Yes, sir.

12 Q. What do they do?

13 A. Well, they made frames for mobile homes at that  
14 time.

15 Q. Did Riblet Products dispose of its waste at  
16 County Road 10?

17 A. Yes, sir.

18 Q. Are you familiar with the types of waste they  
19 sent there?

20 A. Yes, sir.

21 Q. What did they send there?

22 A. Well, there would be parts of frames, a lot of  
23 metal, steel banding, wooden pallets. And they  
24 also spray painted these frames.

25 Q. Did they dispose of paint wastes at the

- 1 landfill?
- 2 A. Yes, sir.
- 3 Q. Did they dispose of solvents at the landfill?
- 4 A. Yes, sir.
- 5 Q. How about degreasers?
- 6 A. Yes, sir.
- 7 Q. Can you recall anything else about Riblet
- 8 Products' waste going to the landfill?
- 9 A. There were two parts of Riblet, and one was
- 10 called the Steel Division, and in the Steel
- 11 Division they made roofs for mobile homes.
- 12 Q. What types of waste did that aspect, the Steel
- 13 Division -- what wastes came from that aspect of
- 14 Riblet Products?
- 15 A. There again, they had also a lot of steel
- 16 banding and skids and cut-off pieces from where
- 17 they've squared up the roof sheeting.
- 18 Q. How about sealers or roof coat?
- 19 A. No, sir.
- 20 Q. Do you recall anything else from the Steel
- 21 Division going to the landfill?
- 22 A. No, sir.
- 23 Q. Did they have two containers at Riblet?
- 24 A. Yes, sir.
- 25 Q. What size were those?

- 1 A. I believe that they were 16-yards.
- 2 Q. How often were those picked up?
- 3 A. I would say probably, if you averaged it out,  
4 once a week. There again, it would depend on  
5 how well the industry was doing.
- 6 Q. The next customer I have is Richmond Wholesale,  
7 202 North Cottage.
- 8 A. Yes, sir.
- 9 Q. What's their business?
- 10 A. They were a candy wholesaler.
- 11 Q. Did they dispose of their waste at the landfill?
- 12 A. Yes, sir.
- 13 Q. What types of waste did they send there?
- 14 A. I can recall nothing but regular paper from  
15 running their office and lots of cardboard  
16 boxes.
- 17 Q. Okay. The next customer I have is Rivershores  
18 Apartments.
- 19 Do you know that customer?
- 20 A. No, sir.
- 21 Q. The next one I have is Riverside 700 Building.
- 22 A. No, sir.
- 23 Q. The next customer I have is Riverview Lumber  
24 Company.
- 25 A. Yes, sir.

1 Q. Do you know them?

2 A. Yes, sir.

3 Q. Did Riverview Lumber dispose of waste at County

4 Road 10?

5 A. Yes, sir.

6 Q. What types of waste did Riverview send to the

7 landfill?

8 A. Mostly just paper, cardboard, and their crating

9 materials.

10 Q. Did they send any wood?

11 A. Yes, sir.

12 Q. Did they send any treated wood to the landfill?

13 A. Not that I can remember, sir.

14 Q. How about glues, epoxies, anything like that?

15 A. No, sir.

16 Q. What size container did they have?

17 A. I believe they had a 16 there.

18 Q. How often was that emptied?

19 A. I believe they were just strictly on a call-in

20 basis.

21 Q. Do you have any average on them?

22 A. Maybe once a week.

23 Q. Okay. The next customer I have is Roadway

24 Express Inc., 28360 Clay Street.

25 Do you know them?

1 A. Yes, sir. I know the name, I know the place,  
2 but I don't recall the trash.

3 MR. OSLAN: Okay. Let's take another  
4 quick break.

5 (Whereupon a short recess was  
6 taken.)

7 BY MR. OSLAN:

8 Q. The next customer I have is Rollie Williams  
9 Paint Spot, P. O. Box 1385.

10 Are you familiar with that company?

11 A. Yes, sir.

12 Q. What is their business?

13 A. They're a paint distributor.

14 Q. Okay. Did Rollie Williams Paint Spot dispose of  
15 their waste at the County Road 10 Landfill?

16 A. Yes, sir.

17 Q. Are you familiar with the types of waste they  
18 sent there?

19 A. Yes, sir.

20 Q. What types of waste did they send there?

21 A. Well, they've sent a few skids. They've sent  
22 cardboard. They've sent empty cans.

23 Q. They sent paint cans?

24 A. Yes.

25 Q. How about cans of paint thinner?

- 1 A. Yes.
- 2 Q. Okay. Did they do manufacturing also?
- 3 A. I don't know about manufacturing, but they do a
- 4 lot of mixing, I know.
- 5 Q. Okay. Do they send degreaser wastes to the
- 6 landfill?
- 7 A. Yes.
- 8 Q. How about solvents?
- 9 A. Yes.
- 10 Q. Okay. Do you recall any other types of waste
- 11 that Rollie Williams Paint Spot sent to the
- 12 landfill?
- 13 A. No.
- 14 Q. Okay. What size container did they have?
- 15 A. They had a 4-yard, I believe.
- 16 Q. How often was that emptied?
- 17 A. That's probably on a once a week basis at least.
- 18 Q. The next company I have is St. Joe Steel.
- 19 Do you know that company?
- 20 A. Yes.
- 21 Q. Is that a steel manufacturer?
- 22 A. Yes.
- 23 Q. Did St. Joe Steel dispose of their waste at the
- 24 landfill?
- 25 A. I don't believe they did at County Road 10.

1 Q. Okay. The next customer I have is Schmeling  
2 Sunoco Service.  
3 Do you know them?  
4 A. No, sir.  
5 Q. The next customer I have is Schott Industries  
6 Inc., Action Flex Division.  
7 Do you know them?  
8 A. No, sir.  
9 Q. The next customer I have is Sears Automotive at  
10 the Pierre Moran Mall.  
11 Do you know them?  
12 A. Yes, sir.  
13 Q. Is that an automobile maintenance and repair  
14 company?  
15 A. Yes, sir.  
16 Q. Did Sears Automotive dispose of its waste at  
17 County Road 10?  
18 A. Yes, sir.  
19 Q. Are you familiar with the types of waste that  
20 Sears disposed of at County Road 10?  
21 A. Yes, sir.  
22 Q. Did Sears dispose of oily rags and oil wastes?  
23 A. Yes, sir.  
24 Q. Did they dispose of automobile parts with oil on  
25 them?

- 1 A. Yes, sir.
- 2 Q. Did they dispose of solvents at the landfill?
- 3 A. Yes, sir.
- 4 Q. Did they dispose of degreasers at the landfill?
- 5 A. Yes, sir.
- 6 Q. Did they dispose of used batteries at the
- 7 landfill?
- 8 A. Yes, sir.
- 9 Q. Do you recall any other types of waste that
- 10 Sears Automotive disposed of at the landfill?
- 11 A. Mufflers and tailpipes and car parts.
- 12 Q. What size container did Sears Automotive have?
- 13 A. I believe they had a 4-yard.
- 14 Q. How frequently was that emptied?
- 15 A. I'd say that's on a once a week basis also.
- 16 Q. Was anybody else picking up their waste at that
- 17 time?
- 18 A. Not that I know.
- 19 Q. The next customer I have is Selmer Division, 241
- 20 South Industrial Parkway.
- 21 Do you know them?
- 22 A. Yes, sir.
- 23 Q. What business are they in?
- 24 A. Band instrument manufacturer.
- 25 Q. Did Selmer dispose of its waste at the County

1 Road 10 Landfill?

2 A. Yes, sir.

3 Q. Are you familiar with the types of waste that

4 Selmer disposed of at the landfill?

5 A. Yes, sir.

6 Q. And did that include soldering agents and

7 fluxes?

8 A. Yes, sir.

9 Q. Used buffing wheels --

10 A. Yes, sir.

11 Q. -- with metals on them? Did the buffing wheels

12 have metals on them?

13 A. Yes, sir.

14 Q. Did Selmer dispose of scrap metals at the

15 landfill?

16 A. Yes, sir.

17 Q. Brass?

18 A. To some extent.

19 Q. Did Selmer dispose of paint waste at the

20 landfill?

21 A. Yes, sir.

22 Q. Did Selmer dispose of primers at the landfill?

23 A. Yes, sir.

24 Q. How about lacquers?

25 A. Yes, sir.

1 Q. Paint thinners?

2 A. Yes, sir.

3 Q. Solvents?

4 A. Yes, sir.

5 Q. Cutting oils?

6 A. Yes, sir.

7 Q. Can you think of any other types of waste that

8 Selmer disposed of at the landfill?

9 A. Nothing other than skids and their cardboard

10 that parts were shipped in and paper.

11 Q. Okay. What size container did Selmer have?

12 A. I believe they were in the 16-yard or 22-yard

13 range.

14 Q. How often was their container emptied?

15 A. Probably twice a week.

16 Q. Was anybody else picking up their waste at that

17 time?

18 A. Not to my knowledge.

19 Q. The next customer I have is Seward Sales Corp.,

20 County Road 15 and Bullard Road.

21 Do you know them?

22 A. No, sir.

23 Q. The next customer I have is Shantz Leasing, 915

24 East Woodlawn.

25 Do you know them?

- 1 A. No, sir.
- 2 Q. The next customer I have is Showalter Buick,  
3 21816 U.S. 33 West.
- 4 Are you familiar with them?
- 5 A. Yes, sir.
- 6 Q. Is that an auto dealership that does auto  
7 maintenance and repair?
- 8 A. Yes, sir.
- 9 Q. Did Showalter Buick dispose of its waste at  
10 County Road 10?
- 11 A. I do not believe so, sir.
- 12 Q. Okay. The next customer I have is Shreiner &  
13 Sons, 1035 Industrial Parkway.
- 14 A. Yes, sir.
- 15 Q. Do you know them?
- 16 A. Yes, sir.
- 17 Q. What's their business?
- 18 A. They're a plumbing supply warehouse.
- 19 Q. Did Shreiner & Sons dispose of its waste at the  
20 County Road 10 Landfill?
- 21 A. Yes, sir.
- 22 Q. What types of waste did they send there?
- 23 A. Mostly their office supplies, paper and  
24 cardboard and some skids, steel banding.
- 25 Q. How about pipe?

- 1 A. No, sir.
- 2 Q. Do you recall any plumbing products that they  
3 disposed of?
- 4 A. No, sir.
- 5 Q. Okay. Do you recall anything other than the  
6 waste you've identified with respect to Shreiner  
7 & Sons?
- 8 A. No, sir.
- 9 Q. How large a container did they have?
- 10 A. I believe they had a 4-yard.
- 11 Q. How frequently was that emptied?
- 12 A. I believe that would be about once a week.
- 13 Q. The next customer I have is Silvercote Products  
14 Inc., 2630 Industrial Parkway.  
15 Do you know them?
- 16 A. Yes, sir.
- 17 Q. What was their business?
- 18 A. Well, they made the roof coating for mobile  
19 homes.
- 20 Q. Did Silvercote Products dispose of its waste at  
21 the County Road 10 Landfill?
- 22 A. Yes, sir.
- 23 Q. What types of waste did Silvercote dispose of at  
24 the landfill?
- 25 A. Here again, a lot of wooden skids and banding.

1           And the Silvercote coating itself would get in  
2           the bottom of the containers, and we'd have to  
3           kind of scrape it out of there.

4   Q.     So they disposed of Silvercote product, whatever  
5           it was?

6   A.     Yes.   Empty drums.

7   Q.     Do you know what was in the drums before?

8   A.     No, sir.

9   Q.     How about solvents?

10  A.     Yes, sir.

11  Q.     Any degreasers?

12  A.     I'd say yes, sir.

13  Q.     Can you recall any other types of waste that  
14           Silvercote Products disposed of at the landfill?

15  A.     No, sir.

16  Q.     Are they still in business; do you know?

17  A.     No, sir.   I think they are, though, but I'm --

18  Q.     What size container did they have?

19  A.     I believe they had about like a 42-yard.

20  Q.     How often was that emptied?

21  A.     Probably on about a once a week basis.

22  Q.     The next customer I have is Simpson Medical  
23           Group, Inc., 236 Simpson Street.

24                   Do you know them?

25  A.     Yes, sir.

1 Q. What do they do?

2 A. It's a medical clinic.

3 Q. Did they dispose of their waste at the County

4 Road 10 Landfill?

5 A. Yes, sir.

6 Q. What type of waste did they send there?

7 A. I really -- I really don't know. They were just

8 a small front-end loader.

9 Q. Okay. The next customer I have is Ski-Tow

10 Manufacturing, 3301 Phillips Street.

11 Do you know them?

12 A. The name sounds familiar, but I can't recall

13 their trash, no, sir.

14 Q. Okay. The next company is Skyline Corporation

15 at the airport.

16 Do you know them?

17 A. Yes, sir.

18 Q. What is their business?

19 A. Well, they're a mobile home manufacturer. But

20 this was at the airport, so I think they owned a

21 plane and had a hangar, but I can't recall their

22 trash.

23 Q. Did Skyline Corporation dispose of its waste

24 from another location other than the airport at

25 the landfill?

- 1 A. Not that I can recall, no, sir.
- 2 Q. Okay. Do you recall anything specific about the  
3 trash that Skyline disposed of at the County  
4 Road 10 Landfill from the airport?
- 5 A. No, sir.
- 6 Q. The next customer is Smead Paint Shop, 1834 ,  
7 Fieldhouse Avenue.
- 8 Do you know them?
- 9 A. Yes, sir.
- 10 Q. What is their business?
- 11 A. They're a paint shop.
- 12 Q. Do they manufacture, or do they just sell  
13 retail?
- 14 A. No, I think they're a body shop.
- 15 Q. Did Smead Paint Shop dispose of its waste at  
16 County Road 10?
- 17 A. Yes, sir, I think they did.
- 18 Q. Okay. Do you recall the types of waste they  
19 sent there?
- 20 A. Yes, sir. I think they threw away paint cans,  
21 paper where they had masked off things.
- 22 Q. How about solvents?
- 23 A. Yes, sir.
- 24 Q. How about paint thinner?
- 25 A. Yes, sir.

- 1 Q. Degreasers?
- 2 A. Yes, sir.
- 3 Q. Okay. Do you recall any other types of waste
- 4 that Smead Paint Shop disposed of at the
- 5 landfill?
- 6 A. There could have been a few parts from
- 7 automobiles or repair work.
- 8 Q. What size container did they have?
- 9 A. I believe they had a 16-yard.
- 10 Q. How often did they empty that out?
- 11 A. I believe they were on a call-in basis.
- 12 Q. Do you remember any average?
- 13 A. In good times, probably once a week.
- 14 Q. The next customer I have is Smith's Transfer
- 15 Corp., 28520 County Road 20 West.
- 16 Do you know them?
- 17 A. No, sir.
- 18 Q. Okay. The next customer is Sorg Dodge, Inc.,
- 19 U.S. 33 West.
- 20 Do you know them?
- 21 A. Yes, sir.
- 22 Q. Did they do automobile maintenance and repair
- 23 there at that dealership?
- 24 A. Yes, sir.
- 25 Q. Did Sorg Dodge dispose of its waste at the

1 County Road 10 Landfill?

2 A. I don't believe so, sir.

3 Q. The next customer I have is South Side Plating  
4 Works, Inc., 2306 South Main Street.

5 Do you know them?

6 A. The name is familiar, sir.

7 Q. You don't recall anything specific about them?

8 A. No, sir.

9 Q. Okay. The next customer I have is Speedgrip  
10 Chuck, Inc., 200 Industrial Parkway.

11 Do you know that company?

12 A. The name is familiar, but no, sir.

13 Q. The next customer I have is Speedway Petroleum,  
14 Emerald Marketing Central Division.

15 Do you know them?

16 A. No, sir.

17 Q. The next customer I have is Star Machine, Inc.,  
18 1620 Middlebury.

19 Do you know them?

20 A. Yes, sir.

21 Q. What is their business?

22 A. They're a machine shop. I know where they are,  
23 but there again, I can't recall their trash.

24 Q. Okay. The next customer I have is State Wide  
25 Aluminum, 23601 County Road 6.

1 Do you know them?

2 A. Yes, sir.

3 Q. What is their business?

4 A. They were an aluminum forming company. They  
5 sold to the mobile home industry. And what I  
6 recall about them was skids and a lot of  
7 banding, scrap pieces of aluminum.

8 Q. Did they do soldering and dispose of soldering  
9 wastes?

10 A. Not to my knowledge, sir.

11 Q. Aluminum parts, aluminum pieces?

12 A. Just pieces, yeah.

13 Q. How about cutting oils?

14 A. Not that I can recollect. The most I can -- it  
15 seemed to me like they have an awful lot of wood  
16 and steel bandings and scraps of aluminum and  
17 cardboard.

18 Q. Okay. How large a container did they have?

19 A. They had a 42-yard.

20 Q. How often was that emptied?

21 A. I'd say in the good times, twice a week.

22 Q. The next customer I have is Sterling Engineered  
23 Products, 1230 Miner Road.

24 Do you know them?

25 A. No, sir.

1 Q. The next customer is Suburban Manufacturing,  
2 55712 County Road 15.

3 Do you know them?

4 A. No, sir.

5 Q. How about Superior Body Works, 521 East Lincoln?

6 A. No, sir.

7 Q. The next company is Taylor Products, formerly  
8 Tecumseh, 1100 West Beardsley Avenue.

9 Do you know them?

10 A. Yes, sir.

11 Q. What business was or is Taylor Products in?

12 A. They manufactured mufflers for Tecumseh.

13 Q. Okay. Do they manufacture any other products  
14 there; do you know?

15 A. I believe they made air filters.

16 Q. Did Taylor Products dispose of its waste at the  
17 County Road 10 Landfill?

18 A. Yes, sir.

19 Q. Are you familiar with the types of waste that  
20 Taylor Products disposed of there?

21 A. Yes. There were some metal stampings for  
22 manufacturing mufflers and wood and cardboard.

23 Q. How about oily rags?

24 A. Yes, sir.

25 Q. Degreasers?

- 1 A. Not to my knowledge, sir.
- 2 Q. How about solvents?
- 3 A. There again, not to my knowledge.
- 4 Q. Did they have any sludges or grease that they  
5 disposed of at the landfill?
- 6 A. No, sir, not to my knowledge.
- 7 Q. Do you recall anything else about Taylor  
8 Products' wastes?
- 9 A. No, sir.
- 10 Q. How large a container did they have?
- 11 A. I believe they had a 16-yard.
- 12 Q. How often was that emptied?
- 13 A. I'd say an average of once a week.
- 14 Q. The next customer is Taylor Service, 117 Freight  
15 Street.
- 16 Do you know them?
- 17 A. No, sir.
- 18 Q. The next customer is Teledyne Metal Forming,  
19 1936 Sterling Avenue.
- 20 Are you familiar with them?
- 21 A. The name is very familiar, but I can't recall  
22 anything about their trash, no, sir.
- 23 Q. The next customer I have is Textone, Inc., now  
24 Woodtek, 1706 West Lusher Avenue.
- 25 Do you know them?

- 1 A. Yes, sir.
- 2 Q. What's their business?
- 3 A. It runs in my mind that they were finishers of
- 4 plywood.
- 5 Q. Did Textone dispose of its waste at the County
- 6 Road 10 Landfill?
- 7 A. Yes, sir.
- 8 Q. What types of waste did they dispose of there?
- 9 A. A lot of steel banding, skids, drums.
- 10 Q. What was in those drums? Sealers or --
- 11 A. Yes, sir. I would say yes.
- 12 Q. Okay. How about epoxies or glues, anything like
- 13 that?
- 14 A. I would say more in the nature of varnish.
- 15 Q. Varnish. How about paints, did they do any
- 16 painting there?
- 17 A. Well, I consider varnish a paint.
- 18 Q. Okay. Do you recall anything else about
- 19 Textone's waste that they sent to the landfill?
- 20 A. No, sir.
- 21 Q. How large a container did they have?
- 22 A. They had a 42-yard.
- 23 Q. How often was that emptied?
- 24 A. I would say on an average of once a week.
- 25 Q. The next customer I have is Titan Homes, 58277

1 State Road 19.

2 Do you know them?

3 A. There again, the name is awful familiar, but I  
4 can't place them. No, sir.

5 Q. Okay. The next customer I have is Top's Mobile  
6 Home Center, 28676 U.S. 20 West.

7 Do you know them?

8 A. Yes, sir.

9 Q. What is their business?

10 A. They're just a mobile home sales lot.

11 Q. Okay.

12 A. I can't recall anything about their trash other  
13 than the office-type paper and material.

14 Q. Okay. The next customer I have is Trade Names,  
15 Inc., 2323 Middlebury Street.

16 Do you know them?

17 A. Yes, sir.

18 Q. What's their business?

19 A. They were an RV distributor for supplies.

20 Q. Did Trade Names, Inc., dispose of its waste --

21 A. Yes.

22 Q. -- at County Road 10?

23 A. Yes, sir.

24 Q. What types of waste did it dispose of there?

25 A. Just skids, cardboard, paper, banding material.

- 1 Q. How about paint wastes?
- 2 A. Not that I can recall, sir. No, sir.
- 3 Q. Did they do any gluing or epoxy use?
- 4 A. No, sir, not that I can recall.
- 5 Q. Okay. How large a container did they have?
- 6 A. They had a large container, 42-yard.
- 7 Q. How often was that emptied?
- 8 A. I would say on the average of once a week.
- 9 Q. Okay. The next customer I have is Trawood  
10 Manufacturing, P. O. Box 7705.
- 11 Do you know them?
- 12 A. Yes, sir.
- 13 Q. What was their business?
- 14 A. I believe they were in the cabinet manufacturing  
15 business.
- 16 Q. Did they dispose of their waste at County Road  
17 10?
- 18 A. Yes, sir.
- 19 Q. What types of waste did they send there?
- 20 A. Lots of wood, banding. And here again, I think  
21 they had empty cans with lacquer thinner in it,  
22 paint thinner, whatever.
- 23 Q. Varnish?
- 24 A. Yes.
- 25 Q. Did they use glues and generate glue wastes,

1 wastes having glue in them?

2 A. Yes, sir.

3 Q. How about solvents?

4 A. Not to my knowledge.

5 Q. Okay. Do you recall anything else about Trawood  
6 Manufacturing's wastes that were disposed of at  
7 the landfill?

8 A. No, sir.

9 Q. How large a container did they have?

10 A. I believe they had a 16-yard.

11 Q. How often was that emptied?

12 A. Probably there again, once a week. It just  
13 depends on how the business was running.

14 Q. The next customer I have is Triangle Products,  
15 Inc., 2111 Industrial Parkway.

16 Do you know them?

17 A. Yes, sir. The name there again sounds very  
18 familiar, but to recall their trash, I cannot.

19 Q. Okay. The next customer is Trico Paint Co.,  
20 Inc., 3126 Prairie Street.

21 Are you familiar with Trico?

22 A. No, sir.

23 Q. Okay. The next customer is Truth Publishing  
24 Co., Inc..

25 Do you know them?

1 A. Yes, sir. That's the paper.

2 Q. That's the newspaper?

3 A. Yes, sir.

4 Q. And did the Truth Publishing Company use County  
5 Road 10 to dispose of its waste?

6 A. Yes, sir.

7 Q. What types of waste did the Truth dispose of at  
8 the landfill?

9 A. Lots of old newspaper, end rolls. And I know  
10 that there would be blue ink of some sort that  
11 would come out there, blue or black, that used  
12 to get on the dozer and make quite a mess.

13 Q. Did they have any solvents around? Did they  
14 dispose of solvents?

15 A. Yes, sir.

16 Q. Do you recall any other types of waste that  
17 Truth Publishing disposed of at the landfill?

18 A. No, sir.

19 Q. How large a container did they have?

20 A. I believe they had a 16-yard.

21 Q. How often was that emptied?

22 A. And I think they might have had a 4-yard that we  
23 emptied also with the front-end loader.

24 And I think on the 4-yard we might be  
25 down there a couple, two, three times a week.

- 1 Q. How about the 16?
- 2 A. I would say that was less frequently. Maybe  
3 once a week.
- 4 Q. The next company I have is Turtle Top.  
5 Do you know them?
- 6 A. No, sir.
- 7 Q. How about U-Rent-It Company, Inc., 1651 Toledo?
- 8 A. Yes, sir.
- 9 Q. What's their business?
- 10 A. They rent anything you want to pour cement, rake  
11 your yard, mow your grass. It's just a you rent  
12 it. They have all kinds of rental tools there.
- 13 Q. Did U-Rent-It dispose of its waste at County  
14 Road 10?
- 15 A. Yes, sir.
- 16 Q. What types of waste did they send there?
- 17 A. As I recall, it would just be from cleaning up  
18 their equipment and the paper supplies that it  
19 took to run U-Rent-It.
- 20 Q. Did they dispose of oily rags?
- 21 A. Yes, sir.
- 22 Q. How about solvents?
- 23 A. Yes, sir.
- 24 Q. Degreasers?
- 25 A. Yes, sir.

1 Q. Did they generate any paint wastes?

2 A. Not to my knowledge, sir.

3 Q. Okay. Do you recall anything else about  
4 U-Rent-It Company's waste going to the landfill?

5 A. No, sir.

6 Q. What size container did they have?

7 A. I believe they had a 4-yard container, front-end  
8 loader.

9 Q. How often was that emptied?

10 A. Probably on an average of about once a week.

11 Q. Yeah.

12 Q. Was anybody else picking up their waste at that  
13 time?

14 A. Not to my knowledge.

15 MR. OSLAN: Let's take another quick  
16 break.

17 (Whereupon a short recess was  
18 taken.)

19 BY MR. OSLAN:

20 Q. The next company on the list is U.S.  
21 Conversions, Inc., at 28761 Dexter Drive.

22 Do you know them?

23 A. Yes.

24 Q. What is their business?

25 A. They're a van conversion outfit.

1 Q. And did U.S. Conversions dispose of its waste at  
2 the County Road 10 Landfill?

3 A. No, I don't think so. I'm going to go out on a  
4 limb on this one, but I think they come into  
5 play after the landfill.

6 Q. Fair enough.

7 The next company I have is Uniroyal,  
8 Inc., Ball Band Plant in Mishawaka.

9 Do you know them?

10 A. Yes.

11 Q. And what business are they in?

12 A. I don't think that's correct.

13 Q. Okay.

14 A. They had a warehouse here in Elkhart, and I  
15 don't recall anything coming out of Mishawaka.

16 Q. Okay. Did the warehouse dispose of their waste  
17 -- the Uniroyal warehouse, did they dispose of  
18 their waste at County Road 10?

19 A. Yes, I think so.

20 Q. What types of waste did they send there?

21 A. I don't recall anything other than a few skids  
22 and some cardboard and paper products.

23 Q. Okay. The next customer is United Musical  
24 Instruments USA, Inc., 1000 Industrial Parkway.

25 Do you know them?

1 A. No, sir.

2 Q. Next on the list is Universal Forest Products  
3 #218.

4 Do you know them?

5 A. Yes, sir.

6 Q. And what was their business?

7 A. They were a truss manufacturer.

8 Q. Did Universal Forest Products dispose of its  
9 wastes at County Road 10?

10 A. I don't believe so.

11 Q. Okay. The next customer is Valley Machine  
12 Products, Inc., 1840 Borneman Avenue.

13 Are you familiar with that company?

14 A. There again, the name is very familiar, but I  
15 can't recall their trash.

16 Q. How about Village Motor Sales?

17 A. No, sir.

18 Q. How about WSJV?

19 A. That's a TV station.

20 Q. Did they dispose of their waste at the landfill?

21 A. Yes, sir.

22 Q. What types of waste did they send there?

23 A. I recall they were a front-end loader. Nothing  
24 out of the ordinary of what it would take to run  
25 an office.

1 Q. Paper and paper waste?

2 A. Right.

3 Q. Okay. The next company that I have is Wabash

4 Tape, Inc.

5 Are you familiar with that company?

6 A. No, sir.

7 Q. How about Walerko Tool and Engineering, 1935

8 West Lusher?

9 A. Yes, sir. I know where it is, but I can't

10 recall -- in fact, I think we just have a small

11 container there, and it's mostly office paper

12 coming out of that place.

13 Q. How about Walker Automatic Heating?

14 A. Yes, sir.

15 Q. What's that business?

16 A. They were a heating contractor for furnaces for

17 homes. I believe they also had air

18 conditioners.

19 Q. Did they dispose of their waste at County Road

20 10?

21 A. Yes.

22 Q. What types of waste did they dispose of there?

23 A. The only thing I can recall about Walker

24 Heating, they would have skids and they would

25 have some banding material, cardboard, and they

1           would throw away old heat ducts, the tin square-  
2           type heat ducting that used to be in old homes.  
3   Q.   Did they dispose of any air conditioners, air-  
4           conditioning components?  
5   A.   Not that I can recall.  
6   Q.   Do you recall anything else about Walker  
7           Automatic Heating's waste?  
8   A.   No, sir.  
9   Q.   What size container did they have at Walker?  
10   A.   It run in my mind they had an 8-yard.  Something  
11           slightly bigger than a 4-yard.  
12   Q.   How often was that emptied then?  
13   A.   That was on a call-in basis, I feel.  
14   Q.   On the average then.  
15   A.   Once every two weeks maybe.  Maybe -- in the  
16           wintertime, maybe once a week.  It just  
17           depended.  It wasn't a great big place.  
18   Q.   The next customer is Ward Inc., Thompson  
19           Division.  
20                   Do you know them?  
21   A.   No, sir.  
22   Q.   How about Weaver's Sunoco Service, 427 West  
23           Lexington?  
24   A.   No, sir.  
25   Q.   The next company I have is Wee, W-e-e, Shape

1           Frames, P. O. Box 207.

2                       Are you familiar with that company?

3   A.    Yes, sir.

4   Q.    What is their business?

5   A.    They made frames for mobile homes.

6   Q.    Did Wee Shape Frames dispose of its waste at the  
7           County Road 10 Landfill?

8   A.    Yes, sir.

9   Q.    What types of waste did they dispose of there?

10   A.   They had normal skids and banding, cardboard.  
11           And it runs in my mind that they also painted  
12           these frames and would throw away empty paint  
13           barrels.

14   Q.   Did the paint barrels have residues in them?

15   A.   Yes, sir.

16   Q.   How about paint thinner?

17   A.   Yes, sir.

18   Q.   Solvents?

19   A.   Yes, sir.

20   Q.   Do you recall anything else about Wee Shape  
21           Frames' waste disposed of at the landfill?

22   A.   No, sir.

23   Q.   What size container did they have?

24   A.   I think they had a 16-yard. They were a smaller  
25           frame manufacturer.

1 Q. Are they still in business?

2 A. I'm not sure, sir.

3 Q. How often was their container emptied then?

4 A. I would say probably on the average of once a

5 week if business was good.

6 Q. The next customer is Robert Weed Plywood Corp.,

7 Maple Street.

8 A. Uh-huh.

9 Q. Do you know them?

10 A. Yes, sir.

11 Q. Did they dispose of their waste at the landfill?

12 A. Yes, sir.

13 Q. What types of waste?

14 A. The only thing I can recall from Robert Weed

15 again would be scrap pieces of plywood or

16 chipboard that was damaged, skids, banding. And

17 then as we talked yesterday, the paper that has

18 the netting mesh inside and the semis cover

19 these loads up, they would throw away a lot of

20 that.

21 Q. Did they throw away any treated lumber that you

22 recall?

23 A. Not that I recall, no, sir.

24 Q. What size container did they have?

25 A. They had a 48-yard. And there again, I'd say on

1           the average of once or twice a week if the  
2           mobile home industry was going well.

3   Q.    The next company I have is Wells Cargo, Inc.

4   A.    Yes, sir.

5   Q.    What business are they in?

6   A.    They manufacture trailers. Not necessarily  
7           mobile homes but cargo-type trailers.

8   Q.    And did Wells Cargo, Inc., dispose of its waste  
9           at the County Road 10 Landfill?

10  A.    Yes, sir.

11  Q.    What types of waste did they dispose of there?

12  A.    Well, here again, it was steel bandings, skids,  
13           cardboard. And I believe that they also did  
14           some painting there, so possibly empty paint  
15           barrels.

16  Q.    Did they dispose of --

17  A.    Or buckets.

18  Q.    -- paint waste?

19  A.    Yes.

20  Q.    How about paint thinners?

21  A.    Yes.

22  Q.    Did they dispose of solvents at the landfill?

23  A.    Probably, yes.

24  Q.    Okay. Degreasers?

25  A.    Yes.

- 1 Q. Soldering agents?
- 2 A. Not to my knowledge.
- 3 Q. Okay. Do you recall any other types of waste
- 4 that Wells Cargo disposed of, at the County Road
- 5 10 Landfill?
- 6 A. No, sir.
- 7 Q. What size container did they have?
- 8 A. They had a 42-yard, I believe.
- 9 Q. How often was that emptied out?
- 10 A. There again, it depends. I would say on average
- 11 once to -- once a week.
- 12 Q. Okay. The next customer I have is Weyerhaeuser
- 13 Co., 1810 Conant Street.
- 14 Do you know them?
- 15 A. Yes, sir. The name is very familiar, but I
- 16 can't recall what type trash they had.
- 17 Q. Okay. The next customer I have is Whitehall
- 18 Laboratories, 1919 Superior.
- 19 Are you familiar with that company?
- 20 A. Yes, sir.
- 21 Q. Did Whitehall dispose of its waste at the County
- 22 Road 10 Landfill?
- 23 A. Yes, sir.
- 24 Q. What type of business is Whitehall Laboratories?
- 25 A. They were a pharmaceutical manufacturer.

- 1 Q. What types of waste did Whitehall Laboratories  
2 dispose of in the landfill?
- 3 A. Well, your normal skids and cardboard and  
4 banding. And they would throw barrels of liquid  
5 away, and I think it was Neet for removing hair  
6 from ladies' legs. And they would throw away  
7 pills. Let's see, what was it they made?  
8 Dristan. They had a toothpaste that they  
9 produced that they threw away a lot of that.
- 10 Q. Did they throw away oily rags and residues?
- 11 A. Yes, sir.
- 12 Q. How about degreasers?
- 13 A. Yes, sir.
- 14 Q. Solvents?
- 15 A. Yes, sir.
- 16 Q. Paint wastes?
- 17 A. I don't recall paint waste, no, sir.
- 18 Q. Okay. Do you recall any other types of waste  
19 from Whitehall Laboratories?
- 20 A. Well, labels for bottles which may have had glue  
21 residue on them and this type of thing that  
22 would be used in the pharmaceutical business.
- 23 Q. Okay. What size or how many containers did they  
24 have?
- 25 A. And I also believe that they had a dust

1 collector there where they manufactured that  
2 product.

3 Q. A dust collector?

4 A. Yeah.

5 Q. What type of --

6 A. Well, I don't -- I don't recall. Maybe it was  
7 just the filters that came from there. It would  
8 be like about where Miles would produce the  
9 Alka-Seltzer or whatever, to control the dust  
10 they have. Nothing --

11 Q. Okay.

12 A. But some of their loads were dusty when they  
13 came in.

14 Q. Okay. What types of containers did they have at  
15 Whitehall?

16 A. I believe they had a 16 and I believe they had a  
17 42 there.

18 Q. How often were those emptied?

19 A. Probably once to twice a week.

20 Q. Are you aware of any other companies that were  
21 picking up Whitehall's waste during that time  
22 period?

23 A. No, sir.

24 Q. The next customer I have is Williams Shell  
25 Service, 1207 West Lusher.

1 Do you know them?

2 A. Yes, sir, but I don't recall their trash.

3 Q. Okay. The next customer I have is Wind-O-Gard  
4 Industries, Inc., 11277 Third Street.

5 Do you know them?

6 A. There again, that name is very familiar, but I  
7 can't recall their trash.

8 Q. Okay. How about Wolohan Lumber Company, 2700  
9 Middlebury Street?

10 A. Yes, sir.

11 Q. Did they dispose of their waste at County Road  
12 10?

13 A. Yes, sir.

14 Q. What types of waste did they dispose of there?

15 A. Just your typical wooden pallets, banding, maybe  
16 damaged two by fours. And there again, they had  
17 that paper that I discussed before where they  
18 covered piles of lumber or plywood up with it.

19 Q. How about treated lumber, treated woods?

20 A. Yes, sir.

21 Q. Do you recall anything else about Wolohan Lumber  
22 Company's waste that was shipped to the  
23 landfill?

24 A. No, sir.

25 Q. What size container did they have?

1 A. I believe they had a 16 there.

2 Q. How often was that emptied?

3 A. I believe it was on a call-in basis. I'd say  
4 maybe an average of once a week or once every  
5 two weeks.

6 Q. The next customer I have is Woodco, Inc.

7 Do you know that company?

8 A. The name is familiar, but I can't recall their  
9 trash, no, sir.

10 Q. Okay. The next one I have is Woodtek.

11 Do you know them?

12 A. Yes, sir. The name is familiar.

13 Q. What type of business were they in?

14 A. If I recall, they made just little trays for  
15 inside of vans to set your coffee cups in or  
16 little dividers for between the two fronts seats  
17 or whatever.

18 But I don't -- I don't recall anything  
19 out of the ordinary about their trash other than  
20 -- and I think it was a small 4-yard container  
21 and having a few pieces of wood in it.

22 Q. How about --

23 A. And just their office supply paper.

24 Q. Do you recall any varnish cans or wood-stain  
25 cans?

1 A. No, sir.

2 Q. Okay. The next customer I have is Workinger  
3 Electric, Inc., 1704 West Bristol.

4 A. Yes, sir.

5 Q. Are you familiar with that company?

6 A. Yes, sir.

7 Q. What business are they in?

8 A. They're a motor repair shop, electric motor  
9 repair shop, have electric supplies.

10 Q. Did Workinger dispose of its waste at County  
11 Road 10?

12 A. Yes, sir.

13 Q. What types of waste did they send there?

14 A. Well, there again, skids, banding, paper,  
15 probably old electrical wires off of motors.

16 Q. Did they send old motor parts?

17 A. Yes, sir.

18 Q. Did they send any capacitors or transformers,  
19 anything like that?

20 A. Not that I can recall, no, sir.

21 Q. Do you recall anything else about Workinger  
22 Electric's wastes at the landfill?

23 A. No, sir.

24 Q. Okay. Do you recall how large a container they  
25 had?

- 1 A. I believe they were a 4-yard front-end loader.
- 2 Q. How often was that emptied out?
- 3 A. Probably about a once a week basis.
- 4 Q. The next company I have is Yellowstone, Inc.,  
5 2400 Mishawaka.
- 6 Do you know them?
- 7 A. Yes, sir.
- 8 Q. What do they do?
- 9 A. They were a mobile home manufacturer.
- 10 Q. Did Yellowstone, Inc., dispose of its waste at  
11 the County Road 10 Landfill?
- 12 A. Yes, sir.
- 13 Q. And are you familiar with the types of waste  
14 they sent there?
- 15 A. Yes, sir.
- 16 Q. And what types of things?
- 17 A. Well, there again, they sent skids, steel  
18 banding, cardboard. And it runs in my mind  
19 there were 5-gallon buckets with the roof coat,  
20 empty with the residues in them. There were  
21 glue barrels with the residue left in them.
- 22 Q. How about paint wastes?
- 23 A. Paint wastes, yes, sir.
- 24 Q. Primers?
- 25 A. Yes, sir.

1 Q. Lacquers?

2 A. Yes, sir.

3 Q. Solvents?

4 A. Yes, sir.

5 Q. Soldering agents?

6 A. Yes, sir.

7 Q. Oils and greases?

8 A. Yes, sir.

9 Q. How about scrap metals?

10 A. Yes, sir.

11 Q. Caulking?

12 A. Yes, sir.

13 Q. How about glues and epoxies?

14 A. Yes, sir.

15 Q. Do you recall anything else about Yellowstone,

16 Inc.'s waste?

17 A. No, sir.

18 Q. How large a container did they have?

19 A. They had a 42-yard or 48-yard.

20 Q. How often was that emptied?

21 A. Probably in the good times, twice a week.

22 Q. Okay. The next company I have is Zook, Inc.,

23 15978 County Road 38.

24 Do you know them?

25 A. Yes, sir.

- 1 Q. What's their business?
- 2 A. Well, they're a trucking outfit, but I don't
- 3 recall their trash. I don't think -- I don't
- 4 think we do anything there but take care of
- 5 their main office, which is paper out of the
- 6 office.
- 7 Q. Okay.
- 8 A. I don't recall.
- 9 Q. Okay. On this list I have just one additional
- 10 customer, Accrapak.
- 11 A. Yes, sir.
- 12 Q. Do you know that company?
- 13 A. Yes, sir.
- 14 Q. What business are they in?
- 15 A. They're an aerosol packaging, I guess that's
- 16 what you would call it, aerosol cans.
- 17 Q. Did Accrapak dispose of its waste at County Road
- 18 10?
- 19 A. Yes, sir.
- 20 Q. What types of waste did Accrapak dispose of at
- 21 the landfill?
- 22 A. They used to throw away an awful lot of cans
- 23 that weren't labeled. Some of them were
- 24 labeled. Some of the labels were crooked.
- 25 Q. These are aerosol cans?

- 1 A. Yes, sir.
- 2 Q. Okay. What other types of --
- 3 A. And then your skids and your cardboard and your  
4 normal trash from running a business.
- 5 Q. Okay. Did they dispose of solvents?
- 6 A. Yes, sir.
- 7 Q. How about degreasers?
- 8 A. Yes, sir.
- 9 Q. Can you think of any other wastes that Accrapak  
10 disposed of at the landfill?
- 11 A. No, other than the idea that if you run over  
12 these cans with the bulldozer, they would  
13 "pssshhh" and you really didn't know just  
14 exactly what you had.
- 15 Q. When you ran over the aerosol cans, did liquid  
16 come out of them?
- 17 A. Yes, sir.
- 18 Q. What size container did Accrapak have?
- 19 A. I believe they had a 48-yard.
- 20 Q. How frequently was that emptied?
- 21 A. At least once a week, I would say, sometimes  
22 oftener than that.
- 23 Q. Okay. Well, we've completed our discussion of  
24 the customers identified on Exhibit 1. There  
25 are other customers that were serviced by HIMCO

1           and whose waste apparently went to the landfill,  
2           and we're going to have to break now from this  
3           statement to allow us time to get an additional  
4           list of customers together, and then we'll come  
5           back and try to go through those as well.

6                     But before we end today, I'd like to  
7           ask you just a few general questions.

8                     It's my impression that the customers  
9           that HIMCO was servicing and the customers whose  
10          waste was being disposed of at County Road 10  
11          typically dumped all of their trash, whatever it  
12          was, into the containers that you provided; is  
13          that correct?

14   A.    To the best of my knowledge, yes, sir.

15   Q.    All right. So is it fair to say that as far as  
16          you know, the companies that we have just talked  
17          about over the last couple days put all of the  
18          trash they generated into the containers that  
19          you guys serviced?

20   A.    Yes, sir. I would say that's true other than  
21          like at a service station or a full-service  
22          garage, more than likely somebody picked up  
23          their used motor oil, but I would have no idea  
24          who they were or what they done with it. But --

25   Q.    Okay. But with respect to most of the companies

1           where you have tried to recall the types of  
2           waste they've sent to the site, to the extent  
3           that you haven't mentioned something, a  
4           particular type of waste, that is, there still  
5           is the chance or the likelihood that if that  
6           company generated that waste, then it got into  
7           the container and therefore got to the landfill?

8   A.    Yes, sir.

9                       MR. OSLAN:   Okay.   Well, having said  
10          that, why don't we break for the rest of the  
11          day, and then we'll have to come back another  
12          day and pick up with the supplemental customer  
13          list.

14                     But we appreciate your time, and  
15          hopefully it hasn't been too hard on you.

16                     (Whereupon the statement was  
17          adjourned sine die.)

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I have read the foregoing transcript and wish to make (select one):

           no changes or corrections;

\_\_\_\_\_ the following changes or corrections  
(attach additional sheets if necessary):

Page	Line	Correction	Reason for change
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**JERRY D. PERRIN**

SUBSCRIBED AND SWORN TO before me  
this \_\_\_\_\_ day of \_\_\_\_\_,  
A.D., 19\_\_\_\_.

Notary Public, State of \_\_\_\_\_  
County of Residence: \_\_\_\_\_  
My Commission Expires: \_\_\_\_\_

## CERTIFICATE

I, Rosemary J. Bell, CSR, RPR, a Notary Public in and for the County of St. Joseph and State of Indiana, do hereby certify there appeared before me JERRY D. PERRIN, who was first duly sworn by me to tell the truth and nothing but the truth in response to questions propounded.

I further certify that I then and there reported in machine shorthand the proceedings at the said times and place; that the proceedings were then reduced to typewriting from my original shorthand notes; and that the foregoing typewritten transcript is a true and correct record thereof.

I further certify that the statement was read and signed in the presence of a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this \_\_\_\_\_ day of \_\_\_\_\_, 1992.

Rosemary J. Bell, CSR, RPR, CP  
Notary Public, State of Indiana  
Residence: St. Joseph County  
My Commission Expires: 9-18-94